

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Sarantos, Marina Eleni                                 :  
          Maier, Steven   :  
   :  
   :       CASE NO. 20-02472-HWV

**MOTION FOR MODIFICATION OF CHAPTER 13 PLAN AFTER CONFIRMATION**

AND NOW comes the Debtors, Marina Eleni Sarantos and Steven Maier, (heretofore referred to as the “Debtors”), by and through their Attorney, Patrick J. Best, Esquire, of ARM Lawyers, respectfully moves this Honorable Court as follows:

1.       On August 18, 2020 the Debtors filed an original Chapter 13 Plan with this Honorable Court.
2.       On November 2, 2020, the Debtors filed a Second Amended Chapter 13 Plan with this Honorable Court.
3.       On December 16, 2020, this Honorable Court entered an Order Confirming the Debtor’s Second Amended Chapter 13 Plan.
4.       The Debtors intend on filing a Fourth Amended Chapter 13 Plan as a result of the following events:
  - a.   The Debtors have fallen behind on their bankruptcy plan payments. They wish to restructure the plan to pay the arrears over the life of the plan.
  - b.   Debtors have also received a mortgage modification and wish to modify the plan to reflect that no arrears are due.
  - c.   In addition, the Debtors are now separated and have two households they are supporting. As such, their expenses have increased.
5.       In accordance with F.R.B.P 3015(g) this Honorable Court requires the filing of a Motion to Modify or Amend the Chapter 13 Plan in order to confirm the Fourth Amended Chapter 13 Plan with the Court.

6. In addition to requesting reimbursement of costs, the undersigned is also seeking \$500 in additional attorney fees for the filing of this Motion

**WHEREFORE**, Debtor respectfully requests that this Honorable Court enter and Order confirming the Debtors Fourth Amended Chapter 13 Plan.

Date: August 8, 2022

/s/ Patrick J. Best  
Patrick J. Best, Esquire  
ARM Lawyers  
18 N 8<sup>th</sup> Street  
Stroudsburg, PA 18360  
Attorney for Debtor